

WISHA REGIONAL DIRECTIVE

Department of Labor and Industries

Division of Occupational Safety and Health

5.96 Hand Protection When Using Knives in Food Preparation

Date Issued: July 14, 2006

I. Background

WAC 296-800-16005 and 296-800-16010 requires employers to conduct hazard assessments to determine whether personal protective equipment is needed, and to certify in writing that such assessments have been completed. In evaluating the need for personal protective equipment, the employer may consider other available forms of protection, such as training and modified work procedures.

WAC 296-800-16065 requires employers to “make sure employees exposed to hazards that could injure their hands use appropriate hand protection” and gives examples of covered hazards, including “*severe* cuts, lacerations or abrasions [emphasis added].” Because knives are used in a wide variety of food preparation activities, this policy directive has been prepared to address questions regarding the application of the standard to such use.

II. Scope and Application

This WISHA Regional Directive (WRD) applies to all DOSH enforcement and consultation activities involving the requirements of WAC 296-800-16065 as they relate to hand protection for employees using knives. This WRD replaces, but does not substantively change WRD 5.96, issued March 20, 2002, which is hereby rescinded.

III. DOSH Enforcement Protocols

How are DOSH staff expected to evaluate the need for PPE when knives are used in the workplace as part of food preparation?

When examining food preparation operations, CSHO's are expected to consider the history of knife cut injuries in the establishment, the level of training, and the work

procedures in place. They are expected to evaluate the employer's personal protective equipment hazard assessment and issue appropriate citations, if any.

Before issuing any citation for failure to require appropriate personal protective equipment in the form of cut-resistant gloves (regardless of whether the required assessment has been cited), the CSHO must determine that *all* of the following criteria exist:

- Employees routinely hold food with one hand while cutting with a knife held in the other;
- The cutting is continuous, repetitive, and high volume, and it normally takes more than two hours during the worker's shift (this would exclude, for example, citations for infrequent cutting, such as slicing a tomato in preparing a sandwich);
- The establishment has a high rate of serious knife cuts or has *overall* conditions commonly resulting in serious knife cuts in similar establishments (this would exclude citations based on the presence and regular use of knives if it cannot be demonstrated that other means of addressing the hazard, such as training or work practices, are not effective).

Approved: _____
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